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WASHINGTON, D.C.

Via ECF

Hon. Jennifer E. Willis
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

WillisNYSDChambers@nysd.uscourts.gov

This request is GRANTED. SO ORDERED.

JENNIFER E. WILLIS

United States Magistrate Judge
May 16, 2024.

Re: *Flextronics Da Amazonia Ltd. v. CRW Plastics USA, Inc.*
Docket No. 21-cv-3863 (LLS) (JW)
Request for Extension

Your Honor:

We represent Plaintiffs Flextronics Da Amazônia Ltda., Flextronics Tecnologia Do Brasil Ltd., and Flextronics Industries Singapore Ltd. (all three entities collectively, “Plaintiffs”). We write respectfully to request a 21-day extension of the time for Plaintiffs to file their inquest memorandum of law setting forth proof of their damages, to **June 10, 2024**, and that Defendant’s time to file any opposing memorandum by extended to **June 24, 2024**.¹ There have been no previous requests for adjournments in this matter.

The reason for this request is that the relevant personnel within Plaintiffs’ organizations, who are predominately located in Brazil, require additional time to communicate internally and compile the necessary information and documentation to support Plaintiffs’ inquest memorandum. This additional time is necessary because, as set forth in Plaintiffs’ motion for default judgment and the *ad damnum* clause of Plaintiffs’ complaint, Plaintiffs’ damages and attorneys’ fees have continued to accrue under the parties’ multiple interrelated agreements since this matter was initiated more than three years ago. Obtaining the necessary information has proven to be a time-consuming task requiring coordination within Plaintiffs’ organization and with Plaintiffs’ legal counsel.

¹ The original deadlines for these submissions, as set forth in the Order dated April 25, 2024 (ECF 23), are May 17, 2024, and May 31, 2024, respectively.

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The docket reflects that, despite being properly served, defendant CRW Plastics USA, Inc., has never appeared in this matter and was adjudged to be in default. Accordingly, we are unable to determine their position with respect to this request.

Therefore, pursuant to the Fed. R. Civ. P. 6 and Judge Willis' Individual Civil Practice Rules I.C, we kindly request that the court allow us until June 10, 2024, to file Plaintiffs' inquest memorandum of law setting forth proof of Plaintiffs' damages.

Respectfully submitted,

/s/ Emily J. Mathieu

Emily J. Mathieu



CERTIFICATE OF SERVICE

I certify that on May 15, 2024, I caused the foregoing to be served by first class mail
upon the following:

CRW Plastics USA, Inc.
5775 Brighton Pines Ct.
Howell, MI 48843

Derian Campos
c/o Registered Agent
2036 Ewall St.
Mount Pleasant, SC 29464-3076

/s/Emily J. Mathieu
Emily J. Mathieu